"UNDER SEAL"

FILED CHARLOTTE, NC

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

NOV 2 9 2024

US DISTRICT COURT WESTERN DISTRICT OF NC

| UNITED STATES OF AMERICA |) DOCKET NO. 3: 240-243-MOC |
|--------------------------|---|
| v. |) BILL OF INDICTMENT |
| MAURICE HOPKINS |) Violations: 18 U.S.C. § 245(b)(2)(F)) 42 U.S.C. § 3631(b)) 18 U.S.C. § 924(c) |

THE GRAND JURY CHARGES:

COUNT ONE

(Interference with Federally Protected Activities)

On or about June 8, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

MAURICE HOPKINS,

did, by force and threat of force, willfully intimidate and interfere with, and attempt to intimidate and interfere with, A.G., D.K., N.S., D.A., Y.C., R.I., M.J., and Y.P., because of their race, color, religion and national origin, and because they were enjoying the goods, services and facilities of a restaurant, to wit: Zambies Pizza in Charlotte, North Carolina. The offense included the use, attempted use, and threatened use of a dangerous weapon, that is, a firearm.

All in violation of Title 18, United States Code, Section 245(b)(2)(F).

COUNT TWO

(Interference with Federally Protected Housing Rights)

On or about June 8, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

MAURICE HOPKINS,

did by force and threat of force, willfully intimidate and interfere with, and attempt to intimidate and interfere with A.G., D.K., N.S., D.A., Y.C., R.I., M.J., and Y.P. because they are and had been, and in order to intimidate them and any other person and class of persons from participating, without discrimination on account of race, color, religion, and national origin, in the occupation of any dwelling. The offense included the use, attempted use, and threatened use of a dangerous weapon, that is, a firearm.

All in violation of Title 42, United States Code, Section 3631(b).

COUNT THREE

(Possession of a Firearm in Furtherance of a Crime of Violence)

On or about June 8, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

MAURICE HOPKINS,

did knowingly carry, use, and brandish a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the violation of 18 U.S.C. § 245(b)(2)(F) charged in Count One of this Bill of Indictment; and the violation of 42 U.S.C. § 3631(b) charged in Count Two of this Bill of Indictment; and did knowingly and unlawfully possess that firearm in furtherance of both of these crimes of violence.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 924, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Sections 853, 924, and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this Bill of Indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant to the extent of the value of the property described in (a), (b), and (c).

A TRUE BILL:
FOREPERSON

DENA J. KING UNITED STATES ATTORNEY

NICK J. MILLER

ASSISTANT UNITED STATES ATTORNEY

KRISTEN M. CLARKE

ASSISTANT ATTORNEY GENERAL, CIVIL RIGHTS DIVISION

CHŁOE M. NEELY

TRIAL ATTORNEY, CIVIL RIGHTS DIVISION